

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

PEOPLE OF THE STATE OF MICHIGAN

Plaintiffs

Case No. 1:24-cr-00115-HYJ

V

Hon. HALA Y. JABOU  
Chief District Court Judge

BRIAN WILLIAM KEELY,  
Defendant

ORONDE C. PATTERSON (P 57211)

ERIKA A. TUSAR (P 56831)

JOHN S. PALLAS (P 42512)

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PEOPLE'S EMERGENCY RESPONSE TO DEFENSE MOTION TO  
INSPECT VEHICLE MOTION

NOW COMES the MICHIGAN DEPARTMENT OF ATTORNEY  
GENERAL, by and through, Attorney General DANA M. NESSEL, and Assistant  
Attorney's General Oronde Patterson (P57211) and Erika Tusar (P56831), and  
respond to the defense motion to inspect the vehicle Officer Keely was driving  
during the incident and states as follows:

1. The People wish to be heard on this Motion before the Court rules.
2. The parties have been trying to negotiate with defense counsel for weeks and have offered several solutions to no avail including asking defense counsel to file something with the Court before today's date.

WHEREFORE People respectfully ask that the People be heard before ruling on this Motion and adjourn the defense request.

Respectfully submitted,

  
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Oronde Patterson (P57211)  
First Assistant Attorney General  
Criminal Trial Division